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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

303-422-0164

November 5, 1991

Federal Communications Commission
Washington, D. C. 20554

Re: MM Rulemaking 7772

Ladies and Gentlemen:

I hereby request leave to file the following Reply Comments after the deadline for such. All parties who have filed comments are being provided with a copy of this letter.

INTRODUCTION

This letter is to offer a rebuttal to the comments the National Translator Association (NTA) submitted in response to the request of the Community Broadcasters Association (CBA) for a rulemaking.

By way of background, I have been associated with the manufacturing and installation of translators since 1957 and have, I am sure, a reputation of being a promoter thereof. Since I am a member of the Board of Directors of NTA, these comments are in effect a dissenting statement, but from a person sympathetic to the continued well-being of translators.

I have also been active in the engineering aspects of "Low Power Television", and have assisted translator as well as "LPTV" applicants in the selection of channels and engineering parameters for, or prepared completely, more than 25 applications in each of the "LPTV" windows that have been opened so far.

We are coming up on the 10th anniversary of the adoption of the

basic LPTV rules and the time when the concept of protected contours and predicted interference ratios were first put to use. It is too much to expect that the first LPTV rules adopted in March 1982 would be perfect; and it is logical to expect they should be reviewed after substantial experience has been accumulated. I am satisfied that a review is timely now. The merits of the issues raised by CBA need to be examined and debated. The arguments NTA puts forth are not reasons for refusing a thorough examination, and, what's more, some of them are not well-grounded in basic facts.

IDENTIFICATION and CALL SIGNS

NTA suggests advertisers might be misled by call signs that are of the same format as full-service stations:

I have been asked by LPTV station operators to prepare coverage maps with grade A, B, and principal city contours as defined in Part 73 and I know that it is common for such coverage maps to be used by LPTV stations for selling advertising, just as they are by full service stations. Businesses that buy advertising frequently have the predicted coverage presented to them and would logically demand it if it were not. Further, they are sensitive to results and any misunderstanding resulting from four or six letter call signs would be short-lived. It should be noted that FM stations whether Class A with limited range or Class C with maximum range have call signs with the same format, apparently without confusing advertisers.

CHANGE IN THE NAME OF THE SERVICE

NTA is concerned that a change in the name of the basic service would cause the translator concept to lose its hard won identity:

I suspect that having a special official name for certain LPTV stations would be administratively awkward. However, there is no downside to changing the LPTV Station designation as used in Part 74 Subpart G to "Community Television Station", going beyond the suggestion of CBA. It is an idea that is certainly worth examining in detail.

Note also that under Part 74, Subpart G of the FCC Rules translators are a special kind of LPTV station. If the name of the service were changed, translators would not lose their identity but would remain as a sub-category under the new name.

POWER INCREASE

NTA is concerned that, if LPTV stations were allowed to use higher power, channel availability for translators would be substantially diminished:

NTA states¹ that it believes CBA is proposing "a new service in which full service television stations would be 'engineered-in' between stations to which they would cause interference ...". It does not appear to me that that is what CBA is proposing. Rather, I interpret CBA's request to mean that a station that meets certain programming requirements would be allowed to have a transmitter power greater than the present limit, but subject to meeting the present interference protection requirements.

In my opinion it would be difficult and undesirable to have the transmitter power limit based upon programming criteria as proposed by CBA. However, there is no question that some, perhaps many, LPTV stations would be more viable and the public would be better served if more power were allowed.

Contrawise, it is also true that the selection of channels for

1. NTA Comments, pg.6, C, line 3.

future translators could become more difficult in a few locations, but given the ample availability of channels at most places where translators serve a useful purpose, the increased distances to protected contours or reach of potentially interfering signals is only a limited problem.²

A look at the history of translators and LPTV stations is instructive. The first UHF translators were limited to 10 watts and the first VHF translators to 1 watt and even at this power level there was concern over possible interference problems. Both limits were soon raised by a factor of ten when experience showed the lower limit was both inadequate and unnecessary. Subsequently the UHF limits were raised to 1000 watts, again without significant problems arising.

It would be sensible specifically to examine the implications of another ten times (10 dB) increase in power, while retaining the present interference criteria. This would go a long way towards allowing stations to meet CBA's coverage objective while still exercising caution with respect to interference and to the foreclosing of opportunities for future translators.

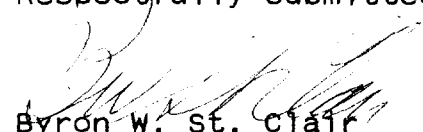
CONCLUSION

There are benefits to the changes requested by CBA which would allow LPTV stations to currently serve the public better and also for them to have greater economic viability and be able to serve the public better in the long run. However, there is some potential for undesirable effects from the CBA proposal. The balance between the benefits and adverse effects is hard to judge with such information as is available casually. I believe the changes requested by CBA should not be summarily dismissed based

2. A UHF LPTV station with an HAAT of 600 feet (midrange of typical values) and an ERP of 100 kW (high end of typical values) would have a protected contour (74 dBu) at 20.5 miles. A ten times increase in power would increase this distance to 29.1 miles. At 100 kW, and utilizing offset, the threshold of predicted interference to a cochannel LPTV station or translator at its protected contour (74 dBu) would occur at 70.0 miles. With a ten times increase in power this distance would increase to 103.5 miles.

upon speculation, but rather there should be a "Rule Making Proceeding" to develop the pros and cons of the several components of the CBA request.

Respectfully submitted,



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303-422-0164

CERTIFICATE OF SERVICE

I, Byron W. St. Clair, do hereby certify that on November 7, 1991, I mailed copies of the foregoing Reply Comments of the Community Broadcasting Association, by postage-paid, first-class United States mail, to the following:

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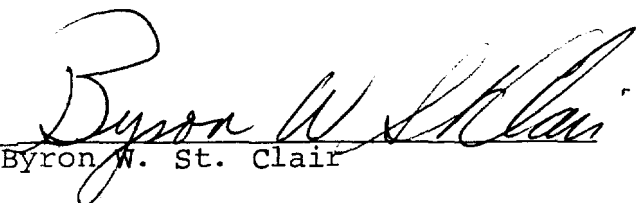
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